

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

FUND LIQUIDATION HOLDINGS LLC, as assignee
and successor-in-interest to FrontPoint Asian Event
Driven Fund L.P., MOON CAPITAL PARTNERS
MASTER FUND LTD., and MOON CAPITAL
MASTER FUND LTD., on behalf of themselves and
all others similarly situated,

Plaintiffs,

v.

CITIBANK, N.A., BANK OF AMERICA, N.A.,
JPMORGAN CHASE BANK, N.A., THE ROYAL BANK
OF SCOTLAND PLC, UBS AG, BNP PARIBAS, S.A.,
OVERSEA-CHINESE BANKING CORPORATION
LTD., BARCLAYS BANK PLC, DEUTSCHE BANK
AG, CREDIT AGRICOLE CORPORATE AND
INVESTMENT BANK, CREDIT SUISSE AG,
STANDARD CHARTERED BANK, DBS BANK LTD.,
ING BANK, N.V., UNITED OVERSEAS BANK
LIMITED, AUSTRALIA AND NEW ZEALAND
BANKING GROUP, LTD., THE BANK OF TOKYO-
MITSUBISHI UFJ, LTD., THE HONGKONG AND
SHANGHAI BANKING CORPORATION LIMITED,
COMMERZBANK AG, AND JOHN DOES NOS. 1-50,

Defendants.

Docket No.: 1:16-cv-05263-AKH

**NOTICE OF DEFENDANTS'
MOTION FOR LEAVE TO FILE A
RESPONSE TO PLAINTIFFS'
SUR-REPLY IN OPPOSITION TO
DEFENDANTS' MOTION TO
DISMISS THE FOURTH AMENDED
CLASS ACTION COMPLAINT**

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law, Defendants¹ respectfully move this Court, before the Honorable Alvin K. Hellerstein, United States District Judge at the United States District Court, Southern District of New York, located at 500 Pearl Street, New York, NY 10007, for an order granting Defendants leave to file a brief of no more than five (5) pages in response to the Sur-Reply Memorandum of Law in Opposition to Defendants' Motion to Dismiss the Fourth Amended Class Action Complaint filed by Plaintiffs Moon Capital Partners Master Fund Ltd., Moon Capital Master Fund Ltd., and Fund Liquidation Holdings LLC on January 28, 2022 (ECF No. 463).

¹ The "Defendants" are Australia and New Zealand Banking Group, Ltd. ("ANZ"), Bank of America, N.A., Barclays Bank PLC, BNP Paribas, S.A., Commerzbank AG, Crédit Agricole Corporate and Investment Bank ("CACIB"), DBS Bank Ltd., MUFG Bank, Ltd. (f/k/a The Bank of Tokyo-Mitsubishi UFJ, Ltd.), Oversea-Chinese Banking Corporation Ltd., The Royal Bank of Scotland plc (n/k/a NatWest Markets plc), Standard Chartered Bank, UBS AG ("UBS"), and United Overseas Bank Ltd.

Dated: New York, New York
February 4, 2022²

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² All electronic signatures (“/s/”) are signed with consent of counsel pursuant to Rule 8.5 of this Court’s Electronic Case Filing Rules & Instructions, as of February 1, 2021.

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